

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

SHANON S. RILEY,

Plaintiff,

v.

No. 1:25-cv-00044-KWR-KK

**HEATHER JORDAN, in her individual
and official capacities as the Director
of the New Mexico Workers'
Compensation Administration,**

Defendant.

NOTICE OF SUPPLEMENTAL EXHIBITS

Plaintiff Shanon S. Riley, by and through her counsel of record, Kennedy, Hernandez & Harrison, P.C., respectfully submits this Notice of Supplemental Exhibits pursuant to the Court's Order Directing Parties to Supplement Record (Doc. 17), filed April 8, 2025. The Order stated that the record reflects the Plaintiff's rejection of Defendant's initial offer of reinstatement, "but the Court has no evidence indicating whether Plaintiff has accepted or rejected Defendant's new offer[.]" *Id.*

On February 28, 2025, Plaintiff received a new letter of reinstatement from Defendant. (Doc. 15), filed Mar. 5, 2025, at 8. Unlike Defendant's previous letter, the new letter no longer contained provisions requiring Plaintiff to become "an at-will exempt employee[.]" and the new letter allowed Plaintiff to speak with NMWCA staff on matters unrelated to her employment. *Id.* Plaintiff considered these changes and rejected the letter of reinstatement. *See* Second Rejection Letter, attached hereto as Exhibit 1. On March 7, 2025, Plaintiff's counsel delivered the signed rejection to defense counsel via email, explaining that Defendant's terms of reinstatement continued to violate Plaintiff's freedoms of speech and association and failed to preserve the status quo by fully reinstating Plaintiff to her position as a WCJ. *See* Second Rejection Email, attached

hereto as Exhibit 2. Plaintiff's counsel expressed that Plaintiff would continue to pursue preliminary injunctive relief to preserve the status quo. *Id.*

Respectfully submitted,

KENNEDY, HERNANDEZ & HARRISON, P.C.

/s/ Jeffrey D. Vescovi

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Attorneys for Plaintiff

I hereby certify that a true copy of the foregoing was served electronically on April 8, 2025, through the CM/ECF system, which caused all parties or counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Jeffrey D. Vescovi

Jeffrey D. Vescovi